

# EXHIBIT 159

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE MIDDLE DISTRICT OF TENNESSEE

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5   NIKKI BOLLINGER GRAE, Individually  
6   and Behalf of All Others Similarly

7   Situated,

8                   Plaintiff,

9   vs.                   CASE NO.

10                       3:16-CV-02267

11   CORRECTIONS CORPORATION OF

12   AMERICA, et al.,

13                   Defendants.

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17                   CONFIDENTIAL

18   VIDEO DEPOSITION OF CAMERON HOPEWELL

19   Nashville, Tennessee

20   January 17, 2020

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24   Reported by:

25   Elisabeth A. Miller Lorenz

  RMR, CRR, LCR No. 66

  Job No.: 10064036

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17           Video deposition of CAMERON HOPEWELL was  
18   taken on behalf of Plaintiff, at Riley, Warnock &  
19   Jacobson, 1906 West End Avenue, Nashville,  
20   Tennessee, beginning at 10:01 a.m., and ending at  
21   1:10 p.m., on Friday, January 17, 2020, before  
22   Elisabeth A. Miller Lorenz, RMR, CRR, and LCR No.  
23   66.  
24  
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## 1 APPEARANCES:

2 For the Plaintiff:

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18 Also Present:

19 David Drumel, Videographer

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1           The court reporter today is  
2 Elisabeth Lorenz, and she may now swear in the  
3 witness.

4                       \* \* \*

5           CAMERON HOPEWELL  
6 was called as a witness, and after having been first  
7 duly sworn, testified as follows:

8           E X A M I N A T I O N

9 BY MR. WOOD:

10 Q     Good morning, Mr. Hopewell.

11 A     Morning.

12 Q     Have you had your deposition taken before?

13 A     No.

14 Q     I'm sure your lawyers went over some of the  
15 logistics, but just to perhaps reemphasize those.

16         It's important that we have a clear record  
17 for the court reporter, so if you let me finish my  
18 question before you answer, and I will let you  
19 finish your answer before I ask you a new question.

20         Okay?

21 A     Uh-huh.

22 Q     It's also important that you answer verbally  
23 with yes or no, whatever your answer is, rather than  
24 head shakes or uh-huhs, because it's hard for the  
25 court reporter to pick that up.

1     memorable, yes.

2     Q     So -- I think you implied this.

3             But you had a lot of folks reaching out to  
4     you about that event, right?

5     A     Yes.

6     Q     And who do you recall reaching out to you?

7     A     I -- I don't remember anything specific.

8     The sell-side analyst that covered the company at  
9     the time -- again, there's been some shifts there,  
10    so I don't know -- I don't recall specifically who  
11    was covering and what firm they were at.

12            But I believe I spoke with every one of them  
13    and then just a number of institutional investors,  
14    retail investors. It was a large volume of -- of  
15    people that reached out, and I spent the better part  
16    of a week or so responding.

17    Q     And -- and so if -- if you don't -- well, do  
18    you remember any of those specific conversations?

19    A     I don't recall the -- any specific  
20    conversation, no.

21    Q     What -- what was the general kind of  
22    questions that folks were directing to you around --  
23    around that?

24    A     Most of the questions focused on, you know,  
25    what am I missing here; I see that the BOP is

1 10 percent of your business, and your stock is down  
2 40, 50 percent; what -- what is it that I've -- what  
3 is it here that I'm missing; that shouldn't be a  
4 rational response.

5 There were questions around pol- -- general  
6 politics affecting the stock, because 50 percent of  
7 our business was with the federal government,  
8 between the three federal agencies, ICE, Marshals  
9 being much larger than the Bureau of Prisons. So  
10 there was a lot of questions around our value  
11 proposition to those -- to U.S. Marshals and ICE and  
12 how they differ from the BOP.

13 Those -- that was probably the two  
14 biggest -- you know, the biggest things that I was  
15 discussing with people.

16 Q And what do you recall kind of telling  
17 people in response to their inquiries?

18 A That's a point in time where I gained an  
19 appreciation for the fact that the market broadly  
20 viewed our federal business as all the same. They  
21 didn't understand the unique reasons and value  
22 propositions why each agency works with us. So a  
23 lot of time was spent educating folks on that.

24 And then, again, because of the political --  
25 it was in the middle of a presidential campaign, and



1 we were a -- a topic, there was a lot of varied  
2 speculation about political outcomes.

3 Q And what do you mean by speculation about  
4 political outcomes?

5 A Speculating on theoretical outcomes, if a  
6 Democrat is president or if a -- if -- or if a  
7 Republican is president.

8 Q So the possibility that if a Democrat was  
9 president CCA may lose more business?

10 A That was one of -- one of many questions.  
11 Not being a political expert, again, I -- it was a  
12 lot of speculation and theorizing. But it made  
13 sense to me because I -- because almost every single  
14 investor I spoke with truly didn't understand the  
15 difference in our federal customers.

16 Q Well, the -- it -- the percentages were  
17 disclosed in the financial filings, right --

18 A Correct.

19 Q -- like what percentage was the BOP,  
20 U.S. Marshals, and ICE?

21 A Yes.

22 Q So that information was public?

23 A That was, yes.

24 MR. WOOD: Why don't we take a quick  
25 break.



1 THE VIDEOGRAPHER: Off the record at

2 12:11.

3 (Luncheon recess observed.)

4 THE VIDEOGRAPHER: Returning to the

5 record, the time is 12:49.

6 (Marked Exhibit No. 185.)

7 BY MR. WOOD:

8 Q Passing you what's been marked Exhibit 187.

9 And when you're ready, what's -- what is

10 Exhibit 187?

11 MR. WOOD: I'm sorry, was it 184? Was

12 that -- I'm sorry, I skipped -- let's fix this. It

13 should be 185. There you go, Exhibit 185.

14 THE WITNESS: Bear with me --

15 MR. WOOD: Sure.

16 THE WITNESS: -- while I read through

17 the letter here.

18 Okay.

19 BY MR. WOOD:

20 Q What is Exhibit 185?

21 A It is an e-mail from Damon Hininger to

22 myself and Dave Garfinkle, our CFO. It was

23 forwarding an attached letter from what I believe

24 are two congressmen.

25 Q So this is a -- well, they're drafts --

1 I, the undersigned, a Licensed Court  
2 Reporter of the State of Tennessee, do hereby  
3 certify:

4 That the foregoing proceedings were  
5 taken before me at the time and place herein set  
6 forth; that any witnesses in the foregoing  
7 proceedings, prior to testifying, were duly sworn;  
8 that a record of the proceedings was made by me  
9 using machine shorthand, which was thereafter  
10 transcribed under my direction; that the foregoing  
11 transcript is a true record of the testimony given.

12 Further, that if the foregoing pertains  
13 to the original transcript of a deposition in a  
14 federal case, before completion of the proceedings,  
15 review of the transcript [ X ] was [ ] was not  
16 requested.

17 I further certify I am neither  
18 financially interested in the action nor a relative  
19 or employee of any attorney or party to this action.

20 IN WITNESS WHEREOF, I have this date  
21 subscribed my name.

22 Dated: January 31, 2020



23 \_\_\_\_\_  
24 Elisabeth A. Miller Lorenz

25 RMR, CRR, LCR No. 66